

# **APPENDIX 1**

## **INSPECTION REQUIREMENTS**

### **GENERAL REQUIREMENTS**

When conducting an inspection, the inspector must be accompanied by the licensee, registrant, or the facility's designated representative (who must be at least 18 years of age). **IMPORTANT:**

- Do not enter facilities with locked gates and/or No Trespassing signs unless prior approval has been obtained from the facility.
- If you do not find anyone at the facility, follow the procedure to complete an attempted inspection.
- Prior to notifying the facility of your presence, inspectors may observe and record findings without being accompanied by a facility representative at facilities that are open to the public. Before documenting findings on an inspection report, the inspector must discuss the findings with a facility representative.
- A complete exit briefing must be conducted.

The following inspection aids are available to assist with inspections:

- Checklist for Animal Care Inspection sheet
- Canine Care Checklist
- Traceback SOP for random source B dealers
- Inspector Safety and Etiquette When Inspecting Non-Domestic Animals
- Guidance for identifying Direct NCIs
- Enforcement Actions (EA) Guidance for Inspection Reports, which includes guidance for the appropriate action to recommend
- Current RBIS

In all situations, follow the facility's biosafety procedures that they have in place for visitors, and/or put on recommended protective clothing, gear and/or boots. During dog kennel inspections, inspectors should wear disposable shoe covers. Inspectors should wear disposable gloves if it is necessary to touch an animal (at all facilities).

**NOTE:** The licensee is responsible for ensuring the safety of the inspector from the animals. If you feel unsafe, ask the licensee to correct the situation. If the licensee does anything you feel is unsafe you should state that you will leave the facility immediately unless the situation is corrected. If you feel you are in imminent danger, safely leave the area.

### **INSPECTION STEPS**

Basic steps to follow in conducting an inspection of a facility include, but are not limited to:

- Inspect the animals, premises, building(s), enclosures, equipment, and transportation vehicles/equipment for all pertinent requirements of the regulations and standards.
- Consider problems that may occur at other times of the year.
- Review the facility's program of veterinary care, husbandry practices, required records, and when appropriate, the "Exercise Plan" for dogs and

- “Plan for Environmental Enrichment” for nonhuman primates
- For big cats, review the feeding plan to assure adequate nutrition
- When possible, observe the animal handling techniques of facility personnel.

## **DOCUMENTING INSPECTION FINDINGS**

Inspection findings must be documented in the narrative section of the inspection report. Do not type any personal identifiable information (PII) in the narrative of any inspection report, including addresses and phone numbers.

**No NCIs identified** - - If all items are in compliance, then the following statement should be typed on the inspection report: No noncompliance identified on this inspection.

For inspections in response to an incident or complaint, often further review (and/or an IES investigation) is needed to determine compliance. If you are not certain whether noncompliance was involved, do not cite “no noncompliance” under those circumstances. The following stand-alone statement should be typed on the inspection report: “The (incident) is under review.”

**New NCIs identified** - - If a new NCI(s) is identified, it should be cited in the inspection report narrative. The citation should include the following:

1. The section number and most specific subsection letter/number of each noncompliance, and the text of the regulation or standard being cited.  
NOTE: The regulation/standard may be quoted or paraphrased
2. A clear, detailed description of the noncompliance, including when appropriate, the number of animals affected
3. An explanation of why the item is a noncompliance and/or the impact it is having on the animals
4. A correction deadline and a “general” description of what the licensee/registrant needs to do to correct the problem, and assure that it doesn't continue/recur. This description should not be worded in such a way that it could be interpreted that AC is mandating how an NCI is going to be corrected. A correction deadline should be appropriate to the severity of the NCI, and unless animal welfare will be put in jeopardy, be realistic as to what the facility can accomplish.

Use “Direct” NCI designation, if appropriate.

If a noncompliant item falls into more than one section or subsection, cite the noncompliance only in the most applicable section or subsection for each species affected.

**Repeat NCI identified** - - A repeat noncompliant item must be designated on the inspection report whenever an NCI of the same section & subsection was cited on the last inspection. This applies even if different animals and/or different portions of the facility are involved.

NOTE: An NCI *may* be designated as a “repeat” if the same section, subsection, and/or issue were cited on a prior inspection report, even if it was not the most recent inspection. For these NCIs, inspectors should use their professional judgment in deciding whether to

cite the NCI as a new or repeat NCI. Your SACS can provide guidance in these situations.

NOTE: When determining whether to cite an IACUC NCI as a repeat, it is critically important that you drill down to the most specific subsection.

NOTE: In the narrative for a repeat NCI, the regulation/standard quote may be omitted, but components 2 and 3 of an NCI narrative (listed above) must be included. Also, do not assign a new correction date for repeat NCIs.

Use “Direct” NCI designation, if appropriate.

***For all repeat NCIs, you must communicate with your SACS to recommend an enforcement option.***

**“Direct” NCI identified** - - A “Direct” noncompliance is a noncompliance that is currently adversely affecting the health and well-being of the animal, or has the high potential to adversely affect the health and well-being of the animal in the near or immediate future. The correction deadline for a “Direct” noncompliance should be short and never exceed 30 days, and a complete or partial reinspection of a facility with a “Direct” NCI must be completed no more than 45 days after the date of the inspection. The reinspection must be conducted at the facility even if the “Direct” NCI was corrected during the inspection. For a serious direct noncompliance, such as a severe veterinary care problem, the correction date should be very short, e.g., 1 day, and the reinspection should occur the next day and/or whenever needed to verify the correction and ensure animal welfare. Examples of “Direct” versus indirect NCIs are provided in the Direct NCI Guidance handout.

***For all “Direct” NCIs, you must communicate with your SACS to recommend an enforcement option.***

**Exit Briefing** - - An exit briefing is required for all inspections, unless your personal safety is at risk, or harassment, verbal abuse, or other factors are interfering with the inspection process. Take as much time as necessary during the exit briefing to:

- summarize everything that occurred during the inspection,
- discuss the noncompliant items in detail with the licensee or facility representative,
- discuss what he/she may do to correct the problem (if asked),
- make sure that facility representative understands what is expected of him/her,
- educate him/her about animal welfare and the AWA regulations and standards,
- obtain a signature and/or explain to the facility representative how the inspection report will be delivered.

Unless an exit briefing could not be completed, a statement must be included on all inspection reports stating “An exit briefing was conducted with the licensee (or registrant or facility representative).” NOTE: do not use names.

NOTE: If the inspection report is to be delivered by email or certified mail, you must still conduct a detailed and thorough exit briefing. Any item that you will be citing on the inspection report must be discussed during the exit briefing.

**Signature on the Inspection Report** - - The inspector and the licensee or his/her representative should sign all pages of the inspection report. The signature of the licensee or his/her representative certifies that the person received a copy of the inspection. It does not necessarily mean that the person agrees with the findings of the inspection. If the facility representative refuses to sign the inspection report, you should:

- a) leave a copy of the inspection report with the representative after noting on the inspection report that you are doing so, or,
- b) leave a copy of the inspection report with the representative and send a copy via certified mail.

Any facility with a disagreement about the inspection findings may follow the inspection appeals process; the process is described on AC's website. If the licensee or registrant refuses to sign the inspection report, explain the circumstances in the narrative, and leave the signature block blank.

**Delivery of the Inspection Report** - - Unless you obtain supervisory approval to do otherwise, hand delivery is required for inspection reports with Direct NCIs. Although hand delivery is preferred for other inspections as well, they may be delivered via email or certified mail. For all delivery methods, the inspection report must arrive at the facility before the earliest correction deadline or within 5 days post inspection, whichever is earlier. If you cannot meet this deadline, you must obtain supervisory approval.

If sent by email, the inspector must request an email reply verifying receipt of the inspection report by the facility. The email receipt must accompany the original inspection report into the regional office. If an email reply is not received, the inspector must deliver the report by another method so that receipt can be verified.

***Note: A reinspection conducted to evaluate a particular direct or repeat NCI only, should be identified as a "focused reinspection" in the inspection report narrative. A focused reinspection must include an exit briefing.***

## **INSPECTION PHOTOGRAPHS**

Photographs must be taken to document photographable noncompliant item(s) in all of the following situations.

- Direct NCIs and all NCIs on an inspection with a Direct
- Repeat NCIs and all NCIs on an inspection with a Repeat
- All NCIs cited at a facility with an ongoing case
- NCIs that are likely to be appealed
- Transportation (airline) NCIs
- 3<sup>rd</sup> prelicense inspections to document NCIs, or to show that the facility was actually in full compliance (include photos showing NCIs that were documented on prior prelicense inspections were corrected)
- If there are repeat, direct, or transportation records noncompliances, the records must be photocopied or photographed.

All photographs that are to be retained must be labeled and uploaded into ACIS no later than 2 weeks after the inspection. Photos that do not need to be retained should be deleted by the inspector.

## **POST INSPECTION PROCEDURES**

For all inspection interference and refusal occurrences, and for all inspection reports that document a repeat or “Direct” NCIs, or, result in an “unsatisfactory” RBIS rating (based on the ratio of animals inspected and points assigned), you must discuss the finding(s) with your SACS to recommend an enforcement option.

### **RBIS**

You must inspect the facilities below on or before the deadline given in ACIS; if you cannot, you must contact your SACS prior to the deadline so that another inspector can be assigned to conduct the inspection.

- Direct NCIs
- HIF Facilities
- Facilities with repeats for which a 90 day re-inspection was the enforcement option selected

All research facilities must be inspected at least once every fiscal year.

### **ATTEMPTED INSPECTION**

All animal welfare inspections, with the exception of prelicense inspections, are to be conducted on an unannounced basis. An attempted inspection occurs when an authorized person is not available to accompany the inspector, and no inspection is conducted.

NOTE: The person accompanying the inspector must be an adult, i.e., 18 years of age or older.

If nobody is present at the facility, you should call the phone number(s) provided by the licensee/registrant to contact him/her, and determine if an authorized person can be at the facility within 30 minutes. You should wait for 30 minutes, and if nobody shows up you should cite Section 2.126(b), and the narrative should read: “On (*date*) at (*time*), licensee failed to have a responsible person available to conduct an animal welfare inspection.”

NOTE: Use section 2.38(b) for registered research facilities.

Inspection reports citing Section 2.126(b) or Section 2.38(b) should be sent to the licensee or registrant by both regular and certified mail.

### **PRELICENSE INSPECTION**

An applicant’s facility must meet all applicable regulations and standards to obtain a license. Prelicense inspections are scheduled at a time agreeable to the applicant and the inspector. In addition to determining if a facility is in full compliance, prelicense inspections are the best time to educate the applicant about the AWA regulations and standards. Required written records must be completed and inspected during a prelicense inspection in order to consider the facility in compliance, including the PVC, exercise plan for dogs, environmental enhancement plan for primates. There must be a written record of animals on hand with as much of the required information completed as possible.

If the facility is not in full compliance, cite all noncompliant items using the first 3 components of the four-part citation description above (see “New NCIs Identified”), but do **not** give correction dates. The following or similar statement must be included in the narrative: All items must be in compliance within (*number of prelicense inspections left; 1 or 2*) more inspections or by (*date-90 days from 1<sup>st</sup> prelicense inspection*) or the applicant will forfeit the application fee and must wait 6 months to reapply. No regulated activities may be conducted until a USDA license is issued.

If a 3<sup>rd</sup> prelicense inspection is necessary, a 2<sup>nd</sup> inspector or supervisor must be present during the inspection, and photographs must be taken to document the condition of the facility.

For an applicant with large carnivores, elephants, great apes, and/or marine mammals, in addition to any NCIs that are cited, the inspector must include the following statement on the inspection report: “the animal enclosures, handling practices, and employee qualifications are under review.” The responsible inspector must then contact his/her SACS as well as the appropriate species specialist to discuss and review the enclosures, handling practices, and qualifications.

## **REFUSAL OF INSPECTION**

If a licensee refuses to allow an inspection, be sure that you have clearly identified yourself as a USDA Animal Care inspector and that the person refusing to allow the inspection is aware of the serious nature of this violation of the AWA regulations. Unless the situation has escalated to the point at which you don’t feel safe, you should ask the specific question: “Are you refusing to allow the inspection?” If the licensee still refuses to allow an inspection, leave the premises and complete an inspection report designating this as a Routine inspection. Section 2.126(a) should be cited, and you should document the specific circumstances of the refusal in the inspection report narrative; be specific as to date, time, and the identification of the person who refused to allow the inspection. Also include any pertinent statements made by the licensee or registrant. NOTE: Use Section 2.38(b) for registered research facilities. If two or more APHIS officials are present for the inspection and one is denied entry, document this as a refusal of inspection: do not conduct an inspection. Inspection reports for refusals should be sent to the licensee or registrant by both regular and certified mail.

***For any ‘refusal to allow inspection’, you must communicate with your SACS to recommend an enforcement option and develop a plan for follow up inspection.***

## **INTERFERENCE**

If you are being harassed, verbally abused, or interfered with in the course of carrying out inspections, you should inform the licensee or applicant that the inspection can only continue if the harassment, verbal abuse, or interference stops. If it continues, you should discontinue the inspection process and leave the premises. Write an inspection report citing Section 2.4 (NOTE: Use Section 2.30(d) for registered research facilities), and in the narrative, be specific as to date, time, and the identification of the persons involved. You should also include details of the harassment and/or verbal abuse and/or interference. The inspection report should be sent to the licensee or registrant by regular and certified mail.

**For any ‘interference with the inspection’ you must communicate with your SACS to recommend an enforcement action and develop a plan for follow up inspection. If you are being threatened, follow procedures to ensure your safety, including but not limited to leaving the premises and calling 911 if necessary. In that circumstance, you should consult with your supervisor after your personal safety is assured with regard to future steps.**

## **CORRECTING, RESCINDING, AND AMENDING INSPECTION REPORTS**

This should be done on a case by case basis under the direction of your SACS or Regional Office.

### **ADDENDUMS**

- Canine Care Checklist
- Checklist for Animal Care Inspection Reports
- Enforcement Actions (EA) Guidance for Inspection Reports
- Direct NCI Guidance
- Inspection Requirements Handbook: Questions from the AC National Meeting
- SOP for Conducting Tracebacks from Random Source B Dealers

## CANINE CARE CHECKLIST

- \_\_\_\_\_ Daily observation of all dogs within kennel.
- \_\_\_\_\_ All dogs requiring veterinary care have been treated.
- \_\_\_\_\_ Veterinary records have been updated.
- \_\_\_\_\_ Outdated medications have been disposed of properly.
- \_\_\_\_\_ Attending veterinarian has made kennel inspection within 12 months.
- \_\_\_\_\_ All dogs have convenient access to feed and water.
- \_\_\_\_\_ All feed and water bowls have been cleaned and sanitized within last 2 weeks.
- \_\_\_\_\_ All bags of feed and bedding are in tightly lidded containers.
- \_\_\_\_\_ All unopened bags of feed stored off of floor and away from walls.
- \_\_\_\_\_ All enclosures spot cleaned daily.
- \_\_\_\_\_ Areas behind and below enclosures have been cleaned as necessary.
- \_\_\_\_\_ All enclosures have been cleaned and sanitized within last 2 weeks.
- \_\_\_\_\_ All surfaces in contact with the dogs are impervious to moisture.
- \_\_\_\_\_ Surfaces within enclosures are free of sharp points and edges.
- \_\_\_\_\_ Mesh floors of sufficient size to prevent feet from falling through.
- \_\_\_\_\_ Adequate floor space is provided for all dogs.
- \_\_\_\_\_ All dogs have a minimum of 6 inches headroom in enclosure.
- \_\_\_\_\_ Nursing bitches have additional space required for litter.
- \_\_\_\_\_ All dogs in outside kennels have necessary shelters.
- \_\_\_\_\_ All outside shelters have wind and rain breaks in place.
- \_\_\_\_\_ All outside kennels have sufficient shade structures.
- \_\_\_\_\_ Temperature controlled areas are between 45-85 degrees F.
- \_\_\_\_\_ All animal areas within kennel are well ventilated.
- \_\_\_\_\_ Doors, flaps, gates, etc. are in good repair and operate properly.
- \_\_\_\_\_ All drains are functioning properly.
- \_\_\_\_\_ Pest control measures are in place as necessary.
- \_\_\_\_\_ Items not necessary for animal husbandry are not kept within kennel area.
- \_\_\_\_\_ Animal husbandry items are stored in proper areas within kennel.
- \_\_\_\_\_ All dogs and weaned puppies have an approved means of identification.
- \_\_\_\_\_ Records of dogs on hand have been updated and are accurate.



\_\_\_\_\_  
Name of Licensee/Registrant

\_\_\_\_\_  
Lic/Reg No

\_\_\_\_\_  
Site Name/No.

\_\_\_\_\_  
Date of Inspection

### **FACILITIES (Permanent & Transport)**

	Structure & Construction
	Condition & Site
	Surfaces & Cleaning
	Utilities/Washrooms/Storage
	Drainage & Waste Disposal
	Temperature/Ventilation/Lighting
	Shelter from Elements
	Capacity/Perimeter Fence/Barrier

### **PRIMARY ENCLOSURE**

	General Requirements
	Space & Additional Requirements
	Protection from Predators

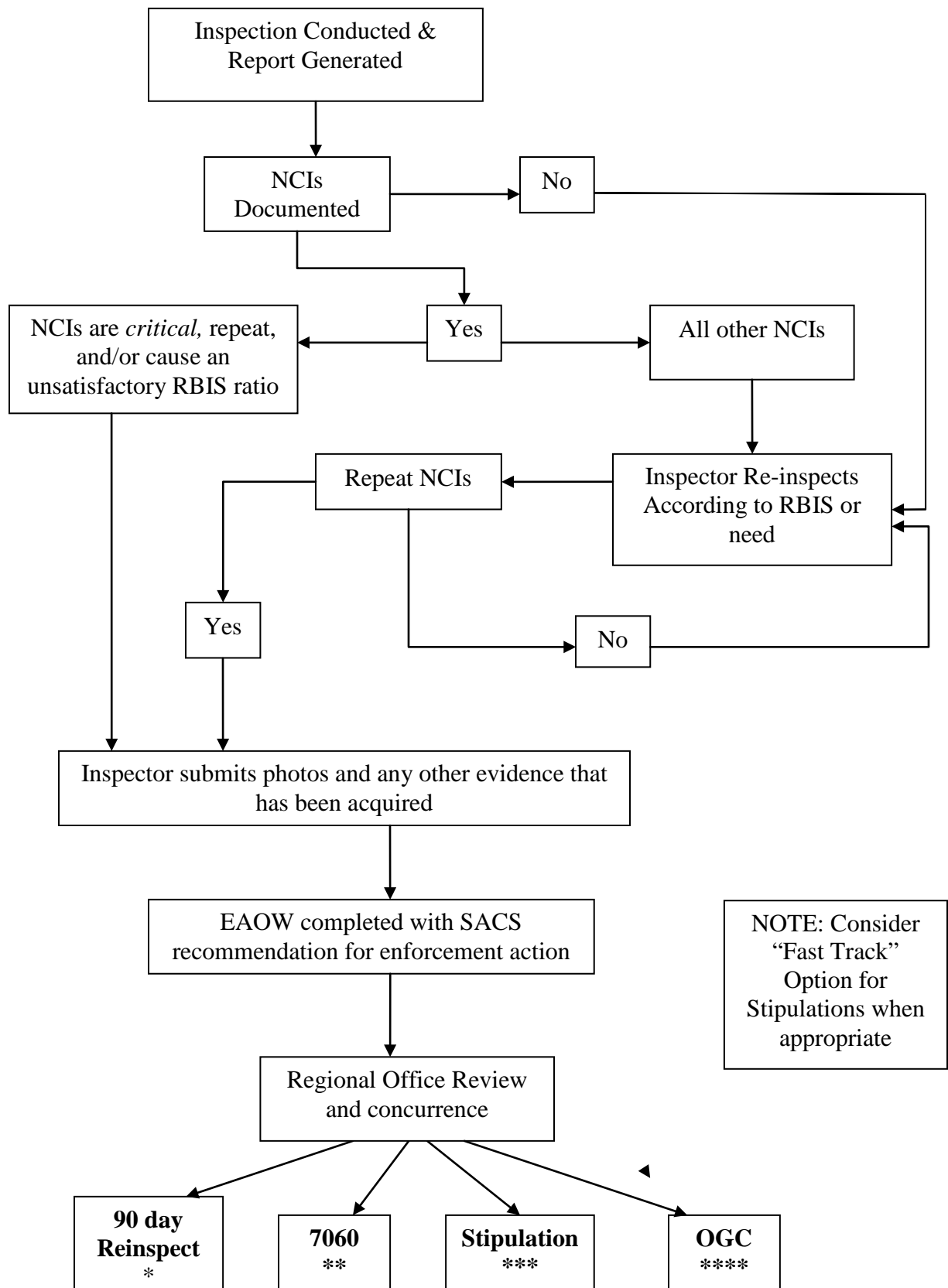
### **ANIMAL HEALTH and HUSBANDRY**

	Exercise & Socialization
	Environment Enhancement
	Feeding
	Watering
	Cleaning & Sanitation
	Housekeeping & Pest Control

### **OTHER**

	Identification
	Records & Holding Period
	Handling
	Veterinary Care
	IACUC
	Personnel Qualifications

## Animal Care Enforcement Actions (EA) Guidance for Inspection Reports



**\* 90 Day Re-inspection**

- Making clear progress toward compliance
- Minor NCIs
- Few # of repeats
- No sign of animals, animal health, or animal welfare being in jeopardy
- No EAs in last 3 years
- Expect compliance
- Note: if compliance not attained in 90 days, proceed to other enforcement steps

**\*\* 7060**

- **May or not be associated with an IES investigation**
- Still out of compliance after 90 day re-inspection and/or
- Multiple repeat NCIs or
- One or more moderate repeat NCI or
- Can be a Direct NCI if no obvious effects on animal health or welfare
- Incomplete documentation of serious NCI
- Slow progress toward compliance
- No EAs (except 90 day re-inspection) in last 3 years

**\*\*\* Stipulation**

- **Must have IES investigation**
- Multiple minor repeat NCIs
- Moderate to serious NCIs
- Repeat direct NCIs
- Lack of progress toward compliance
- Usually have previous EA(s)
- Animal health and/or welfare may have been impacted

**\*\*\*\*\* OGC Prosecution**

- **Must have IES investigation**
- Serious NCIs
- Repeat direct NCIs
- Multiple repeat NCIs
- No progress toward compliance
- Usually have previous EA(s)
- Animal health and/or welfare may have been impacted

**Note: this is the only method by which we can get a suspension or revocation**

## **DIRECT NCI GUIDANCE**

<b>Section Number</b>	<b>Example of Direct NCI</b>
<p><b>Section 2.40</b>  Attending Veterinarian  and Adequate Veterinary  Care</p> <p><b>NOTE: If a licensee or registrant can demonstrate via records or other means that he/she has taken the proper steps to mitigate the injury and/or death of the animal, a violation has not occurred. These proper steps include, but are not limited to, identifying the condition requiring veterinary care in a timely manner, acquiring veterinary care and/or initiating treatment in a timely manner, and/or following the treatment instructions of the Attending Veterinarian.</b></p>	<p>Cherry eye, eye opacity or enlarged eye globe with inflammation and abnormal discharge</p>
	<p>Overgrown toenails causing mal-positioned digits or embedded in pad causing open lesions or gait problems</p>
	<p>Heavy tick/flea infestation (i.e., a high number external parasites are visible) with associated lethargy, pale mucous membranes, labored breathing</p>
	<p>Fly bite ears with associated inflammation, discharge, scratching, hematoma</p>
	<p>Stools that are loose, bloody associated with emaciated and or lethargic dog</p>

	Ongoing respiratory condition with severe cough and/or abnormal nasal discharge
	Presence of contagious disease such as Parvovirus infection, and no isolation area to seclude the affected dogs from the rest of the kennel
	Any untreated, prolapsed, open lesion/wound where the skin is pulled back to expose underlying, tissue, muscle, bone
	Severe ear infection with scratching and rubbing of ears, plus an associated moist ear canal discharge, inflammation or ear hematoma
	Interdigital cysts with discharge, inflammation, and lameness
<b>Section 2.129(a) &amp; (b)</b> Confiscation and Destruction of animals	A confiscation would be the result of a situation that involved animal suffering due to AWA violations and would therefore be considered a Direct NCI; this would typically be cited in the associated sections (vet care, feeding, shelter, etc), but if 2.129 is cited, it is a direct
<b>Section 2.130</b> Minimum Age Requirements	Transportation of dog/cat that has not been weaned, without their dam or queen, and without appropriate variances or exceptions (if required)
<b>Section 2.131</b> Handling of Animals	Death or severe injury to animal as a result of handling procedures; also behavioral stress due to handling violations
	Use of items that causes physical injury, harm or distress to the animals, such as the excessive use of an ankus, hot shot, or any tool used to train or work the animal
	Public exhibition that allows direct contact of a dangerous animal (big cat, bear, wolves, elephant, great ape, etc) with the general public without sufficient or adequate barriers, such as use of a juvenile or adult big cat in photo shoots  Elephant rides w/o an attendant,
	Use of tranquilizers to facilitate public handling of animals

	Failure to provide appropriate measures to alleviate any climatic weather condition that is a threat to the health and welfare of the animal, such as failing to provide sufficient heating, or cooling to an animal barn, housing facility when conditions and the species of the animal require it for the health and welfare of the animal
	Exhibition/performance of an animal that would be detrimental to its health or well-being...such as an immature /young animal that is handled excessively by the public in a petting zoo and is unable to get away from the public; or baby tigers used for photo shoots with excessive public handling showing distress
	Facility that obtains a dangerous animal without having a person knowledgeable and experienced about the species on staff
<b>Section 3.1(a)</b> Housing Facilities General	Structure deterioration (ex. rusted support posts) where the structure is in danger of falling on dogs
<b>Section 3.1(a)</b> Housing Facilities General	Facilities not maintained – animals escape
<b>Section 3.1(b)</b> Housing Facilities General	Live electric wire exposed to and within easy reach of dogs (insulation removed and/or bare ends of cord exposed)
<b>Section 3.2(a), 3.3(a), 3.5(a)</b> Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities	Temperature outside of allowable ranges ... animals showing signs of distress
<b>Section 3.2(a), 3.3(a), 3.5(a)</b> Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities	Temperature below allowable lower ranges ... dry bedding or other methods of conserving body heat not present

<b>Section 3.2(b), 3.3(b), and 3.5(b)</b> Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities	Lack of ventilation to the point where there are noxious fumes (e.g., your eyes burn) at the level of the animal's eyes and nose – dogs are showing signs of discomfort and/or distress such as squinting, coughing, sneezing, nasal discharge, etc
<b>Sections 3.2(c), 3.3(c) and 3.5(c)</b> Indoor Housing Facilities, Sheltered Housing Facilities, Mobile or Traveling Housing Facilities	Absence of lighting and absence of diurnal cycle (No windows and no broad spectrum lighting with appropriate cycling of light and dark)
<b>Sections 3.3(d) and 3.4(b)</b> Sheltered Housing Facilities Outdoor Housing Facilities	Sheltered area not large enough for all dogs to sit, stand, lie in a normal manner, and to turn about freely, and temperature under 45 F or over 85 F ... dogs showing signs of discomfort and/or distress
<b>Sections 3.4(a)</b> Outdoor Housing Facilities	Dogs and cats maintained in areas in which they are not acclimated to the temperatures prevalent in the area, and/or breeds of dogs and cats maintained in areas in which they cannot tolerate the prevalent temperatures without stress
<b>Section 3.4(b)</b> Outdoor Housing Facilities	Shelter with insufficient bedding and Temp under 35, or between 35 and 50 F with dogs showing signs of discomfort (shivering)
<b>Section 3.4(b)</b> Outdoor Housing Facilities	Insufficient wind/rain break and temp under 50F; water in shelter with wet dogs
<b>Section 3.6(a)(1)</b> Primary Enclosure	Enclosure not designed to enable dogs to remain dry (wet dogs), wet dogs, temperature under 45 F
<b>Section 3.6(a)(1)</b> Primary Enclosure	Food situation where one dog doesn't let other dog(s) eat and there are signs of distress and/or emaciation
<b>Section 3.6(c)(1)</b> Primary Enclosure	Enclosure doesn't meet minimum floor space requirements and dog has behavioral and/or medical issues (example - lick granuloma)
<b>Section 3.7</b> Compatible Grouping	Incompatible dogs housed together with injuries and/or signs of distress
<b>Section 3.8</b> Exercise	Insufficient floor space and no opportunity for exercise (no written plan, no evidence of exercise area)

<b>Section 3.9 (a)</b> Feeding	Food contaminated with feces, urine, mold, mildew, pest waste
<b>Section 3.9 (a)</b> Feeding	Emaciated dogs with no feed or inappropriate feed
<b>Section 3.10</b> Watering	No water or frozen water – dogs offered fresh water and drink voraciously and/or in a manner that demonstrates they are extremely thirsty
<b>Section 3.10</b> Watering	Water contaminated with feces, urine, pest waste, mud
<b>Section 3.11(a)</b> Cleaning	Accumulation of excreta and food waste in the primary enclosure ... animals have excreta and/or food waste on their fur, and/or cannot find adequate areas in their enclosure where they can stand or walk without being in waste
<b>Section 3.11(a)</b> Cleaning	Excessive feces and food waste are attracting an accumulation of pests (flies/mosquitoes)
<b>3.11(b)(3)</b> Sanitation	Using cold water without a disinfectant or detergent. And animals are getting ill from a contagious disease.
<b>3.11(c)</b> Housekeeping	Weeds/brush are growing up and around dog pens. Vermin are seen in the dog pens, eating/defecating and/or getting into the food supply.  Holes large enough to allow dogs to escape or other animals to enter, covered by the brush
<b>Section 3.11(d)</b> Pest control	The presence of pests with signs of infestation such as contaminated feed, contaminated water, intense odor, fly strike, and little or no pest control in place
<b>Section 3.12</b> Employees	The lack of an adequate number employees - - numerous repeat and/or direct noncompliances identified on the inspection
<b>Section 3.13(a)(b)(c)</b> Consignments to Carriers and IH	A carrier/IH accepts an animal more than 4 hrs before the scheduled flight departure, and there was no documentation as to when the animal was last fed or watered. And the animal either voraciously goes for food/water when offered, or it becomes ill and needs vet attention, or dies.



<b>Section 3.13(d)</b> Consignments to Carriers and IH	Carrier/IH accepts dog for transport in an inadequate primary enclosure; dog breaks out of the transport enclosure and is lost/injured/killed.
<b>Section 3.13(f)</b> Consignments to Carriers and IH	No documentation is made that the consignee was notified when the shipment arrived, nor every 6 hrs thereafter. The animal becomes ill due to the delay in notifying the consignee
<b>Section 3.14(a)</b> Primary Enclosure Used to Transport Live Dogs and Cats	(1) Animal was able to escape the transport enclosure. (2) Emergency presented itself and the animal enclosure could not be removed in a timely manner. (3) Limbs protruding from the enclosure. (4) Not enough ventilation openings on the enclosure. All resulting in injury, distress, or death.
<b>Section 3.14(c)</b> Primary Enclosure Used to Transport Live Dogs and Cats	The transport enclosure does not meet the ventilation requirements
<b>Section 3.14(d)</b> Primary Enclosure Used to Transport Live Dogs and Cats	A large puppy or dog is put into a transport enclosure with a small puppy or dog, and the smaller dog is seriously injured or dies. There is a disregard for the 20lb rule.  An overly aggressive dog is shipped with another dog and the submissive dog is seriously injured or killed.
<b>Section 3.15(a-h)</b> Primary Conveyances	Primary conveyance is structurally unsound – exhaust fumes enter the cargo space and/or air flow is hindered, and/or animals are exposed to too cold or too hot temps, and/or dry ice is in the cargo space, and/or etc. The result is injury, distress, or death.
<b>Section 3.16</b> Food and Water Requirements	Animals are transported for more than 12 hrs and are not fed or offered water (if under 16 wks) and are now in distress and/or dehydrated and/or needing vet care and/or die.
<b>Section 3.17(a)</b> Care in Transit	Animals are either in a truck or in a plane, and are not observed every 4 hrs (if applicable), and the animals become severely ill, injured, distressed, and/or die.

<b>Section 3.17(c)</b> Care in Transit	Animal is obviously ill, injured, or in physical distress, but it is transported anyway
<b>Section 3.17(d)</b> Care in Transit	Animal is removed from the transport enclosure resulting in injury, escape, and/or death
<b>Section 3.18(c)</b> Terminal Facilities	Lack of ventilation to the point where there are noxious fumes (e.g., your eyes burn) at the level of the animal's eyes and nose – dogs are showing signs of discomfort and/or distress
<b>Section 3.18(d)</b> Terminal Facilities	Temperatures are allowed to fall below 45 or above 85, which results in the animals showing signs of discomfort, distress, or death.
<b>Section 3.18(e)</b> Terminal Facilities	Animals are not provided shelter to extreme elements, which results in the animals being injured, or showing signs of discomfort, distress or death.
<b>Section 3.19(a)</b> Handling	When moving animals from the terminal facility to plane side, the animals were exposed to prolonged time out in the sun, extreme heat, rain, snow, or extreme cold, and now show signs of injury, discomfort, distress or death.
<b>Section 3.19(b)</b> Handling	A transport enclosure is put on an unattended conveyor belt or is haphazardly put onto an unattended belt and the enclosure falls off.

Version = September 9, 2010

## **Inspection Requirements Handbook: Questions from the AC National Meeting**

1. Will the new information that was presented to the ACIs pertaining to both records and veterinary care be shared with the VMOs **The presentations will be shared with everybody, including the VMOs**
2. Re: documenting inspection findings in the narrative: Are we now supposed to include on inspection reports that are the result of a complaint investigation something like: "Note - This inspection was conducted as a result of a complaint (or incident) that is under review." whenever there are NCI or there are no NCI identified?? I have always been told not to indicate anywhere on the report itself that the inspection was prompted by the filing of a complaint. **The restriction is about identifying "who" filed the complaint, and the details of the complaint - not the fact that a complaint was filed. Identifying that the inspection is being conducted in response to a complaint, or that the complaint is under review, is fine. Follow the Inspection Requirements Handbook, but do not discuss the identity of the complainant or the details of the complaint.**
3. Re: repeat NCIs identified and the subsequent report narrative: We were told that including the actual regulation in the narrative was not necessary if a repeat - but is it OK if we do continue to include the actual wording of the Regulation?? Including the actual wording doesn't add much time to writing the narrative. In my opinion if the wording of the Regulation is left off the report, the inspection report is not as efficient or effective an educational tool for the licensee. **Yes, it is fine to include, but it is not required**
4. Re: refusal of signature by licensee: We were told to add onto the report something like "Facility refused to sign the report" and then to leave a copy of the report with them anyway. Can that statement be handwritten on the report, or does it have to be printed (typed) on the report??.....**needs to printed (typed) on the report in ACIS** I am thinking about those times (probably the majority) when you have the report all printed out for delivery, the laptop is shut down, and you go to deliver report/conduct exit briefing - there may not have been any indication during the actual inspection that the licensee would refuse to sign it. So should we boot up the laptop again to include that statement, handwrite it OR just leave the facility without giving them a copy of the report and then once back in our office/hotel add the statement to the report narrative and then go back again to deliver it or send the report via certified and regular mail instead?? **We realize it is an inconvenience, but it needs to printed (typed) on the report in ACIS**
5. Re: those overview photos of a facility: are the overview shots only for PL #3 places or any facility that had lots of NCIs on previous inspection(s) that were corrected at the next inspection?? **There must be overview photos for PL3; you should also take overview photos for any situation in which you believe overview photos will help paint a better picture of the NCIs**
6. Re: "complaint only" RBIS facilities: can these be inspected as a routine by an inspector if time permits/or you are in the area?? Or only to inspect them if/when a complaint filed?? **If time permits and you are in the area, doing an inspection of**

**these facilities is fine; but you should only do that inspection if it does not take away from time in which you could be doing a higher priority inspection.**

7. Attempted inspection reports--can these be emailed instead of cert. mail/regular mail?

**If you have a history of successfully delivering inspection reports via email to the facility, you can try email first. If you do not receive a confirmation of receipt, you need to then send the inspection report by both regular and certified mail**

8. Exit briefings--should we be identifying, by title, all individuals present in the narrative on the IR or only the statement that a facility representative(s) was/were present? **All APHIS personnel present should be identified by name; all facility personnel present should be identified by title**

9. Prelicensures--for those conducted as response to a search/complaint, does the statement "No regulated activities may be conducted until a USDA license is issued" still need to be in the narrative even though they may still be exhibiting before the license process is complete (eg. State Fair exhibitor)? **Yes. They should terminate their activities until licensed in order to show good faith.**

10. Is "none" no longer an option for enforcement actions? I don't see it listed on the flow chart. Since the categories of inspections that require a recommendation has broadened (ex, unsatisfactory), it's hard to believe we will never run into a situation where no action is appropriate. **Instead of "no action", our option is now a 90 day re-inspection. If that 90 day re-inspection finds the facility in compliance, it is likely that further action may not be taken**

11. Can the EA form be added to the database to be prefilled out with the inspection date, etc, to make the recommendations? **The plan is to include the EAOW form as well as the automatic routing of that form in the ACIS database. This is a high priority for Paul Cook.**

12. Can we use wording other than "exit briefing" in the statement on the inspection report? Some licensees will be intimidated by this. A statement such as "the results of the inspection were discussed with XXX" can be more user friendly, especially if we know there will be no legalities involved. **Seems like a small point, but we're stating in our Inspection Requirements Handbook that we will do an exit briefing for all inspections. So the term exit briefing or exit interview needs to be included. An alternative that might be less intimidating is "the results of the inspection were discussed with XXX during an exit interview."**

13. What if the licensee refuses to sign the report, and tells an employee to sign. Can this be indicated in the body of the report - that the licensee was offered the opportunity to sign, but would not? **Yes, it should be indicated in the narrative that the owner was present for the exit briefing, and then the title of the person signing the report will need to be altered to the employee.**

14. For an attempted inspection, if it is a licensee with a good record, why can't we just email the attempted report to them? It's cheaper, and a lot easier than certified. Why has email been removed as an option? **If you have a history of successfully delivering inspection reports via email to the facility, you can try email first. If you do not**

**receive a confirmation of receipt, you need to then send the inspection report by both regular and certified mail**

15. Please provide the reg # and quote we are to use on a prelicense report that requires an APPLICANT for licensing to have animal on hand records completed to be in compliance. 2.75 applies to dealers and exhibitors, and supposedly prelicense applicants are not operating as dealers or exhibitors yet. **Section 2.3(b).**

16. My first question revolves around the taking of photographs at a facility with strict biosecurity measures. I have two facilities where I have to shower in and am furnished with clothing and pen/paper etc. on the other side of the shower. I will not be allowed to take a camera into either facility. Neither facility currently has a camera available on the biosecure side for me to use. I'm not sure we can require that they purchase a camera for use on the secure side--even if they do, how should the resultant photo media be handled? A film camera where a roll of film can be removed might work for these biosecurity arrangements but won't work well in entering into ACIS. A digital camera with a card where the card is removed is problematic because the card, once removed from the secure facility, can't be brought back into the secure facility. One of these facilities does have their computer on the secure side. If they bought a camera, could they download photos and then email them to me? The other facility has no computer on the secure side. I have a third facility that has purchased a camera with which they show me things I wish to look at when I look through the window (during some phases of some studies I cannot enter the room). However, getting hard copies of what they show me is again impossible (same problems as for two facilities above) short of them removing the camera media and then not being able to use it again next time.

Talking to other inspectors at the meeting, I know other inspectors have a different set of problems with photos at their facilities as they are working with select agents and cannot bring anything out of the rooms inspected at all.

So, my question is how do we get photographs at these type of facilities? How much can we legally force them to do as in buying cameras, films etc.? Can we ignore their biosecurity arrangements in favor of letting us bring our cameras into their facility? Do we want that liability? **It is the facility's responsibility to figure it out (Section 2.126, a), and, if it is necessary to take photos, and there is no way to accomplish that, the facility must be cited.**

17. My second question is where in ACIS should the photographs that show no non-compliances remaining that were taken during a passed third prelicense inspection be entered? Can they be coupled to the statement that no-noncompliances were present or should they be put under the photos section for general site information. **General site information.**

18. Re; statement on page 5 of new guidelines pertaining to Repeat, Direct, transportation records NCIs - that the records must be photographed/photocopied. This is clear with some classes of license or registration except for research facilities. I would assume that repeat IACUC citations pertaining to protocol violations would fall under "records" violations. So that would mean that with repeat protocol violations, copies of those records would be required. I know that many of my research facilities would strongly resist giving me copies of the actual protocol due to concerns about releasing proprietary info among other things. So are we now required to make copies of protocols, and if so must it be the entire protocol text, or just that paragraph/section of the protocol that was deemed out of compliance?? **We will need enough info to identify**

**the protocol in question, and the non compliance. You should not remove copies of protocols from the facility during your inspection (unless otherwise directed by your SACS). If the actual protocol documents are needed, they can be requested by the RO or IES.**

19. Re: research facilities again - pertaining to protocol citations - initial inspection identifies NCI under specific section of regs for protocol "A"; next inspection the NCI identified for protocol "A" was corrected. But during this next inspection in reviewing protocol "B", you determine that "B" is out of compliance with that same section of Regs that "A" was at the previous inspection. Is this now a Repeat?? **Yes.**

20. Re: photos - when have a "Repeat" citation on a report we were told that all other photographable NCI on the same report must be photographed. Will this apply to research facilities when the Repeat NCI was a paperwork issue so that now any and all other facility issue identified at research facility must be photographed?? **Yes.**

21. The guidance on what constitutes a "Direct" NCI at the national meeting really only concentrated on licensees with Dogs as "A"/"B" dealers - will there be some guidance on "Directs" for research facilities and exhibitors?? **We believe the guidance is adequate to all kinds of facilities. If you have a question, call your SACS.**

22. Re: designation of "Directs" on reports - there are times when we discover that an incident happened at a research facility many months ago during the review of IACUC minutes or other documents (like 6-8-12 or more months ago). Sometimes these incidents included death of an animal (and likely would be considered to be a Direct NCI), but by the time we learn about it the IACUC has already investigated, implemented changes, etc and the "danger" to animal welfare has passed. Is there any time line for when or if these incidents/NCI should be considered as a Direct? I would think that if the incident was recent, a Direct would be appropriate, but if more than 6 months ago it would not, but I would like to have an official word on that. **"Directs" only apply to "current" negative impacts. So you should only list the citation as a "direct" if there is a real potential for the same thing to occur again.**

23. Can the inspection reports be delivered by fax, with a faxed response that includes the licensee's signature? **No. Hand delivered, e-mail, or certified mail.**

24. Photographs - What should be done with photos taken of newly identified NCIs when there are no Directs, no Repeats, no open investigation, not going to be appealed, not transportation, not third per license? Should the inspector "save" them on their computers or in the camera until the next inspection, or should they be added to the inspection report? When an inspector starts an inspection, he/she may not know if there is going to be a Direct, or something serious later on in the inspection that will trigger a need for all NCIs to be photographed, so rather than having to go back to take photos of things, some of the inspectors are just starting to take snaps of all NCIs. They are just unsure of what to do with them. **Delete the photos off the camera. Save them on a disc until the next inspection, or until you are comfortable that the facility is heading toward compliance.**

25. In the past, we were told that whenever we took pictures and the facility asked, we were permitted to provide the facility with copies (unlabelled, right off the camera). Now that there will most likely be more photos taken during the course of an inspection, is this  
January 31, 2011

still true?? **Some inspectors have provided facilities with photos taken during inspections, but we are discontinuing that practice. The licensee/registrant should be told that they must go through the RO to obtain copies of photographs. We are checking with both FOIA and IES to make sure we can release photos directly from the RO. You can, however, show facilities photos that you have taken; many inspectors do this during the exit briefing. It is often compelling.**

26. If a facility has a NO NONCOMPLIANCES inspection, do they also need to include the statement that "an exit interview with the owner was conducted? **Yes**

27. When taking photos of a non-compliant item(s), how many photos should be taken? For example, if there are 15 dogs with matted hair out of 35, do you want 15 pictures or just a few? If there are 5 pens with broken wires exposed to the dogs, do you want 5 pictures or just one to represent the non-compliant item? **Take a photo of every animal affected for all citations under vet care; this includes matted dogs. For facility violations such as pens with broken wires, take a few photos (i.e., enough to prove the section was violated, but not a photo of every cage).**

28. Some inspectors have been told to put a statement that says "Note: The licensee has repeatedly been found in violation of this (insert standard or regulation) as documented on this inspection report and the inspection reports dated (insert dates of previous reports)" (or something similar) and yet other inspectors do not add a note such as this on the report. Is this something that should be done (or not done) by everyone so that we have more consistency? I have always been told that it helps to tie the inspection reports together and will also help to document that it has been a repeated problem. Just wondering if there will be any guidance given on this one? **Including this note is not a requirement. In order to ensure consistency across the country, please do not include the note.**

# **Standard Operating Procedures for Conducting Tracebacks from Random Source B Dealers**

(July 31, 2009)

A random source B Dealer (RSBD) is a licensed dealer holding a class B license who buys and sells random source dogs and cats. Random source animals are defined in the Animal Welfare regulations as *“dogs and cats obtained from animal pounds or shelters, auction sales, or from any person who did not breed and raise them on his or her premises.”* These animals are generally sold for research purposes. While the term “random source” applies to both dogs and cats, dogs are the animal primarily involved in this type of activity.

Under the RBIS system, RSBDs are inspected more frequently than other dealers because of the nature of their business. One reason for more frequent inspections is to insure that the dogs and cats at the RSBD’s facility were acquired in accordance with regulations. The legitimacy of the acquisition of these dogs and cats is assured by conducting tracebacks on a sampling of the dogs and cats acquired within the time period since the last inspection. A major purpose of the traceback is to determine if a dog or cat was obtained from a legitimate source. A RSBD who acquires random source dogs and cats from prohibited sources is subject to enforcement action.

Note:

The term “dog” as used throughout this document refers to random source dogs.

However, all situations described for dogs also apply to random source cats, since cats may also be involved in random source sales and acquisitions.

The term “pound” as used in this document refers to any pound or shelter that is owned and operated by a State, county, or city, as well as any legal entity operating as a contract pound or humane shelter under the laws of the State in which it is located. (See section 2.132 (a)(2&3) of the regulations.)

## **Inspecting a RSBD**

### **Inspection frequency for a RSBD**

RBIS requires that all RSBDs be inspected no less than quarterly. In practice, this means that inspections of RSBD facilities must be conducted no more than 90 days apart.

### **Sources for random source dogs**

Section 2.132(a) of the regulations limits the acquisition of random source dogs by class B dealers to the following sources:

1. another licensed dealer,
2. state, county, or city owned and operated pounds and shelters,
3. contract pounds or shelters.

Acquiring dogs or cats from sources other than those listed above is noncompliant with regulations and the RSBD may be subject to enforcement action.

If someone, such as a hound breeder, sells dogs that he or she has bred and raised to a RSBD, those dogs are not random source dogs when they are purchased, since they do not meet that definition until the RSBD resells them. The RSBD would be noncompliant with section 2.132(d), however, if he buys 25 or more dogs within a year from an



unlicensed breeder, since that breeder would no longer be exempt from the licensing requirement. Section 2.132(d) and Section 2.133 also contain certification requirements that the RSBD must comply with.

### **Examining RSBD records**

During an inspection, the inspector should determine that the acquisition and disposition records for an RSBD contain all the information required by section 2.75(a). Acquisition records should include the physical address of the seller, not just a PO Box. Every dog acquired or sold by the RSBD must be accounted for and all required information on the seller must be included in the records. The RSBD should be cited for noncompliance on the inspection report if any of this information is missing.

If the RSBD has acquired dogs from a **pound**, the dealer must have acquired a signed statement from that pound certifying that the pound has met the holding requirements for that dog as required by section 2.133(a) of the regulations. The RSBD must obtain such a statement for each dog acquired from a pound, though all dogs acquired at any one time may be placed on the same certification statement.

If the records show that an **unlicensed person** has sold 25 or more dogs and/or cats to the RSBD in a year, that person is not exempt from the licensing requirement. The name and address of this unlicensed dealer should be submitted to the Regional Office (RO) by the inspector, and the RO will determine the necessary course of action. If the RSBD acquired one or more dogs from an unlicensed person, but did not acquire the certifications required by section 2.132(d), the RSBD should be cited for this on the inspection report.

## **Traceback Procedures**

### **Choosing dogs for traceback**

Following every inspection of an RSBD facility, the inspector must conduct tracebacks on a sampling of the dogs acquired by the dealer during the time period since the last inspection. In general, dogs should be chosen for traceback on a random basis. However, all dogs whose acquisition appears suspicious should be traced back. Also, the dogs should not all be from the same seller, but dogs sold by different persons should be chosen whenever possible.

The number of tracebacks conducted will depend upon the circumstances.

- If 4 or fewer dogs were acquired in the quarter, tracebacks should be conducted on each of those dogs.
- If between 5 and 100 dogs were acquired in the quarter, tracebacks should be conducted on at least 4 dogs, or 10% of all the dogs acquired during that period, whichever is greater.
- The maximum number of tracebacks to conduct under normal circumstances is 10. So if more than 100 dogs were acquired in the quarter, the inspector would still only conduct 10 tracebacks.

In some instances, the traceback of 100% of the acquired dogs may be required. This will be determined by the RO, and the inspector will receive specific instructions via their supervisor.

## Conducting a traceback

### **FOR YOUR SAFETY**

Most of the sellers you will be checking on are not accustomed to visits by APHIS, and some may resent the imposition of the Federal government into any area of their life.

If you believe you cannot safely conduct a traceback, contact your SACS. With your SACS, a determination can be made whether a 2<sup>nd</sup> inspector should accompany you to the seller's address, or whether you should attempt to conduct the traceback by telephone only. You should not place yourself in an unsafe situation.

If you determine that you should conduct the traceback by telephone, enter a brief statement into the "Comments" section of the traceback form explaining that the traceback was conducted (or attempted) by telephone due to employee safety concerns. If you are unable to contact the seller by telephone, the traceback should be documented as "unsuccessful."

Every attempt must be made to trace the dog to the person who originally sold it. When practical, most tracebacks should be conducted by visiting the seller listed on the RSBD records. Tracebacks can be conducted by telephone, however, under the following circumstances:

- the seller is a licensed dealer,
- the seller is a pound,
- the seller is a person who is known to the inspector, such as a dog breeder that the inspector recognizes from a previous traceback.

Copies of all tracebacks to be conducted must be sent to the RO along with the inspection report on the RSBD. Inspectors should conduct all tracebacks for sellers located in their inspection areas. If a traceback leads to an address outside of the inspector's area, the inspector must send the traceback form indicating an incomplete traceback to the RO. The RO will then forward this information to the appropriate inspector in whose area the seller is located. In those instances where a seller is in another Region, the RO will send the information to that Region, and information on the traceback will be recorded in the RO in order to follow up on the traceback.

When conducting a traceback, the inspector should ask the seller open-ended questions so as not to indicate the answers that are being looked for. For example, the inspector should ask: "Where did you obtain this dog?" rather than asking: "Did you breed and raise this dog yourself?"

The following information should be obtained from the seller:

- Did the person listed on the records as the seller actually sell the dog or cat?
- If that person verifies being the seller, did he or she breed and raise the dog themselves?
- If the seller says they bred and raised the dog, is there evidence of a kennel on the premises? If not, where did the seller raise the dog?
- Did the seller provide the required certifications to the RSBD?
- If the seller did not breed or raise the dog, where did they get the animal?

If seller is a **private individual**, the above information must be collected and recorded on the traceback form.

If the seller is another **licensed dealer**, the second dealer's records should be examined to verify the sale to the RSBD. If the second dealer is also a RSBD, a traceback now needs to be conducted for this seller listed on this second RSBD's records. This information must also be recorded on the traceback form.

If the seller is a **pound**, the inspector must either call or visit the pound and confirm the sale of the dog. The inspector should also confirm that the certification statement provided to the RSBD for that dog is accurate.

If, while conducting a traceback, the inspector is unable to verify the sale of the dog, e.g., the person listed as the seller did not sell the dog, or the address of the seller listed on the records does not exist, this information should be included on the traceback form, and the traceback should be listed as **unsuccessful**.

All tracebacks must be completed within 30 days of the inspection of the RSBD, or for referred tracebacks, within 30 days of the time the traceback request is received. The inspector must notify his or her SACS if all the tracebacks cannot be completed in that time

### **The traceback form**

A separate traceback form must be completed by the inspector for each dog or cat that the inspector chooses to have traced. The form can be filled out either electronically or by hand. If hand-written, **the writing must be legible**. All completed forms must be sent to the RO.

The inspector must assign a **traceback number** to each traceback form, unless otherwise instructed. The traceback number begins with the RSBD's customer number, which is followed by another number assigned in sequential order. For example, if the RSBD has customer number 9999, the inspector would assign traceback number 9999-1 for the very first traceback, followed by 9999-2, then 9999-3, etc. in sequence for each subsequent traceback.

#### **Note:**

When conducting a 100% traceback, the inspector may include on a single traceback form all the dogs sold to the RSBD by one supplier. When doing this, each dog's ID number must be entered, and a sequence of traceback numbers, one for each dog, must be included on the form. For example, if a supplier sold 10 dogs to the RSBD, the traceback numbers on the form would run from 9999-1 to 9999-10. The dog ID numbers would be listed as 4263 – 4272, if sequential. If not sequential, each individual dog number should be entered.

The inspector conducting the traceback must indicate on the traceback form whether the traceback was successful or unsuccessful.

A **successful traceback** can be one of the following:

- the seller has confirmed that he sold the dog and that he has bred and raised the dog on his premises. Some confirmation of the seller having actually bred the dog should also be made, e.g., there is a kennel on the premises.
- the seller is a pound and has confirmed the sale.

An **unsuccessful traceback** can be one of the following:

- the seller listed in the records claims he did not sell dog,
- the dog was not bred and raised by the seller,
- the address listed for the seller does not exist, the seller's name is fictitious, or the seller is not at that address.

The inspector should also indicate in the Comments section how the traceback was conducted, i.e., by phone or visit, and include a brief description of the results of the traceback, e.g., "Mr. Jones told me he did not breed and raise this dog, but got it from a local pound." The RO will typically request an investigation by IES for unsuccessful tracebacks.

**Unable to contact the seller:** If the inspector is unable to contact the seller and the traceback cannot be completed, the traceback should be listed as unsuccessful, and the inspector should note this in the Comments section on the traceback form and submit it to the RO. The RO will research and check accuracy of the information and consult with the SACS and inspector before determining what course of action to take.

When a traceback is unsuccessful, the RSBD's inspector may need to write an additional inspection report on the RSBD, citing the RSBD for noncompliance with section 2.132(d) for acquiring the dog or cat from an unlicensed and nonexempt source, and/or citing Section 2.133 for failure to provide the recipient(s) with the appropriate certification. The inspector should contact their SACS to determine if another inspection report with the citation should be written.